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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Pedro VASQUEZ PERDOMO; Carlos  
Alexander OSORTO; and Isaac  
VILLEGAS MOLINA; Jorge  
HERNANDEZ VIRAMONTES; Jason  
Brian GAVIDIA; LOS ANGELES  
WORKER CENTER NETWORK;  
UNITED FARM WORKERS;  
COALITION FOR HUMANE  
IMMIGRANT RIGHTS; IMMIGRANT  
DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as  
Secretary, Department of Homeland  
Security; Todd M. LYONS, in his  
official capacity as Acting Director, U.S.  
Immigration and Customs Enforcement;  
Rodney S. SCOTT, in his official  
capacity as Commissioner, U.S.  
Customs and Border Patrol; Michael W.  
BANKS, in his official capacity as Chief  
of U.S. Border Patrol; Kash PATEL, in  
his official capacity as Director, Federal  
Bureau of Investigation; Pam BONDI, in  
her official capacity as U.S. Attorney  
General; Ernesto SANTACRUZ JR., in  
his official capacity as Acting Field  
Office Director for Los Angeles, U.S.  
Immigration and Customs Enforcement;  
Eddy WANG, Special Agent in Charge  
for Los Angeles, Homeland Security  
Investigations, U.S. Immigration and  
Customs Enforcement; Gregory K.  
BOVINO, in his official capacity as  
Chief Patrol Agent for El Centro Sector  
of the U.S. Border Patrol; Jeffrey D.  
STALNAKER, in his official capacity as  
Acting Chief Patrol Agent, San Diego  
Sector of the U.S. Border Patrol; Akil  
DAVIS, in his official capacity as  
Assistant Director in Charge, Los  
Angeles Office, Federal Bureau of  
Investigation; Bilal A. ESSAYLI, in his  
official capacity as U.S. Attorney for the  
Central District of California,

Defendants.

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF JOHN L.  
SCHWAB IN SUPPORT OF  
INTERVENORS' UNOPPOSED *EX*  
*PARTE* APPLICATION TO  
PARTICIPATE IN JULY 10 TRO  
HEARING**

[Filed Concurrently: *Ex Parte*  
Application; [Proposed] Order]

Judge: Hon. Maame Ewusi-Mensah  
Frimpong

**DECLARATION OF JOHN L. SCHWAB**

I, John L. Schwab, hereby declare:

1. I am admitted to practice before all of the Federal and State courts in the State of California, including the United States District Court for the Central District of California. I am a partner in the law firm of Munger, Tolles & Olson LLP, counsel for Plaintiffs-Intervenors (“Intervenors”) the City of Los Angeles, the City of Culver City, the City of Montebello, the City of Monterey Park, the City of Pico Rivera, the City of Santa Monica, and the City of West Hollywood in the above-captioned matter. I submit this declaration in support of Intervenors’ Unopposed *Ex Parte* Application to Participate in the July 10 Hearing on Plaintiffs’ Applications for Temporary Restraining Orders. The contents of this declaration are based on my personal knowledge. If called as a witness, I could and would testify competently to the matters set forth in this declaration.

2. On July 7, 2025, I informed Daniel A. Beck, Ryan Case Chapman, and Sean Skedzielewski, counsel for Defendants, via email of the date and substance of Intervenors’ anticipated *Ex Parte* Application, asked if Defendants intended to oppose, and offered to meet and confer. On July 8, 2025, I and my colleagues Martin Estrada and Virginia Grace Davis met and conferred with Mr. Beck and Mr. Chapman regarding Intervenors’ *Ex Parte* Application. Following the meet and confer, Mr. Beck provided the following statement: “The Defendants do not oppose the ex parte request to participate in the July 10 TRO hearing. The Defendants support fair, open, and transparent resolution of the issues. As with all hearings, the Defendants believe the hearing should be conducted in a way that is based upon the pleadings on file, is not unduly repetitive, and gives fair voice to argument by the opposing sides.”

3. I also conferred with Plaintiffs' counsel on July 7 regarding the date and substance of this Application. Counsel for Plaintiffs confirmed that Plaintiffs do not oppose this Application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8th day of July, 2025, at Los Angeles, California.

/s/ John L. Schwab  
John L. Schwab